1 2 3 4	PAUL J. RIEHLE (SBN 115199) paul.riehle@faegredrinker.com FAEGRE DRINKER BIDDLE & REATH LLP Four Embarcadero Center San Francisco, California 94111 Telephone: (415) 591-7500 Facsimile: (415) 591-7510	CYNTHIA E. RICHMAN (D.C. Bar No. 492089; pro hac vice) crichman@gibsondunn.com GIBSON, DUNN & CRUTCHER LLP 1700 M St NW. Washington, DC 20036 Telephone: 202.955.8500 Facsimile: 202.467.0539
5 6 7 8 9 110 111 112 113	GARY A. BORNSTEIN (pro hac vice) gbornstein@cravath.com YONATAN EVEN (pro hac vice) yeven@cravath.com LAUREN A. MOSKOWITZ (pro hac vice) lmoskowitz@cravath.com MICHAEL J. ZAKEN (pro hac vice) mzaken@cravath.com M. BRENT BYARS (pro hac vice) mbyars@cravath.com CRAVATH, SWAINE & MOORE LLP 375 Ninth Avenue New York, New York 10001 Telephone: (212) 474-1000 Facsimile: (212) 474-3700	MARK A. PERRY, SBN 212532 mark.perry@weil.com JOSHUA M. WESNESKI (D.C. Bar No. 1500231; pro hac vice) joshua.wesneski@weil.com WEIL, GOTSHAL & MANGES LLP 2001 M Street NW, Suite 600 Washington, DC 20036 Telephone: 202.682.7000 Facsimile: 202.857.0940 Attorneys for Defendant Apple Inc.
14	Attorneys for Plaintiff Epic Games, Inc. UNITED STATE	S DISTRICT COURT
15 16		RICT OF CALIFORNIA ND DIVISION
	EPIC GAMES, INC., Plaintiff, Counter-defendant,	Case No. 4:20-CV-05640-YGR-TSH OMNIBUS SEALING STIPULATION ON
16 17 18 19 20 21	EPIC GAMES, INC.,	RICT OF CALIFORNIA ND DIVISION Case No. 4:20-CV-05640-YGR-TSH
116 117 118 119 120 121 122 122 123 131 141 151	EPIC GAMES, INC., Plaintiff, Counter-defendant, v. APPLE INC.,	Case No. 4:20-CV-05640-YGR-TSH OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS
116 117 118 119 120 121 122 123 124 125 125 136 137	EPIC GAMES, INC., Plaintiff, Counter-defendant, v. APPLE INC.,	Case No. 4:20-CV-05640-YGR-TSH OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS
16 17 18 19 20 21	EPIC GAMES, INC., Plaintiff, Counter-defendant, v. APPLE INC.,	Case No. 4:20-CV-05640-YGR-TSH OMNIBUS SEALING STIPULATION ON UNDISPUTED SEALING REQUESTS

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Pursuant to Civil Local Rules 7-11 and 79-5, Section 12 of this Court's Standing Order regarding Post-Briefing Omnibus Sealing Procedures, and Your Honor's Order Regarding Pending Motions to Seal (Dkt. No. 1660), Plaintiff Epic Games, Inc. ("Epic") and Defendant Apple Inc. ("Apple") (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with the following filings:

- 1. Apple's Motion for Entry of Judgment on Indemnification Counterclaim and supporting papers (filed under seal at Dkt. No. 872);
- Apple's Reply in Support of Apple's Motion for Entry of Judgment on Indemnification Counterclaim and supporting papers (filed under seal at Dkt. No. 893);
- 3. Apple's Opposition to Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 916);
- 4. Epic's Reply Memorandum in Support of Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 922);
- Epic's Corrected Reply Memorandum in Support of Epic's Motion to Enforce Injunction and supporting papers (filed under seal at Dkt. No. 926);
- 6. Epic's Opposition to Apple's Motion to Modify Order Regarding Witness Communications and supporting papers (filed under seal at Dkt. No. 1035);
- 7. December 9, 2024 Joint Case Management Statement (filed under seal at Dkt. No. 1067);
- 8. Joint Status Report Re Special Master Review and supporting papers (filed under seal at Dkt. No. 1152);
- Epic's Motion for Relief From a Nondispositive Pretrial Order of a Magistrate Judge and supporting papers (filed under seal at Dkt. No. 1304);

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10	. Apple's	Motion	to S1	trike (Certain	Hearing	Testimony	and	supporting	papers ((filed
	under se	al at Dk	t. No	. 1327	7);						

- 11. Apple's Response to Order Regarding Discovery Sanctions and supporting papers (filed under seal at Dkt. No. 1329);
- 12. Epic's Response to Apple's Opposition to Discovery Sanctions and supporting papers (filed under seal at Dkt. No. 1355);
- 13. Epic's Opposition to Apple's Motion to Strike Testimony and supporting papers (filed under seal at Dkt. No. 1366);
- 14. The Parties' exhibits admitted during the evidentiary hearing held on February 24–26, 2025 (filed under seal at Dkt. No. 1543);
- 15. Epic's Motion for Relief From a Nondispositive Pretrial Order of a Magistrate Judge (filed under seal at Dkt. No. 1621);

I. Apple's Justification for Requested Sealing

These filings contain a variety of confidential information of the type this Court has previously allowed to remain sealed in this case and of which courts in this District routinely authorize sealing. The general categories of information at issue are listed below, and the following table identifies each of the documents at issue with the particular grounds for the sealing request:

- Apple's internal billing policies, processes, and systems for conducting litigation and managing vendor billing;
- negotiations with Apple's vendors during this litigation;
- financial data relating to costs expended by Apple in this litigation;
- financial analysis, research, and decision-making about pricing;
- business codenames regarding ongoing confidential projects;
- injunction compliance plans;

 document review protocols drafted by outside counsel and internal Apple legal guidance drafted by in-house counsel (with the input of outside counsel); and

• personal identifying information.

Apple operates in an intensely competitive environment, and thus has taken extensive measures to protect the confidentiality of its information. Public access to this information could cause Apple economic harm and put it at a disadvantage with competitors.

Epic takes no position on the justifications set forth by Apple above or the sealing requests made by Apple below .

II. Sealing Requests

All of the sealing motions at Dkt. Nos. 872, 893, 916, 922, 926, 1035, 1067, 1152, 1304, 1327, 1329, 1355, 1366, 1543, and 1621 were unopposed.¹

UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR WITH REDACTIONS									
Dkt. No.	Sealing Party ²	Portion to be Sealed	Description	Sealing Basis ³ (Supporting Declaration)	Previously Sealed				
872-3	Apple	Redacted as reflected in the highlighted text	Apple's Motion for Entry of Judgment	Competitively sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor	No				

¹ To the extent it is not explicitly stated as a basis for sealing, Apple requests that all Personally Identifiable Information ("PII") present in any of the documents discussed herein is maintained under seal. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data.

² "Sealing Party" refers to the party seeking to seal the material described herein, irrespective of which party originally filed the information under seal.

³ Each "sealing basis" described in this stipulation is the representation of the "sealing party."

1					billing; (2)	
2					negotiations with each of Apple's	
2					vendors during	
3					the Epic matter;	
4					and/or (3) financial	
					information	
5					relating to costs	
6					expended by	
7					Apple in the <i>Epic</i> litigation	
					contained in	
8					Motion. (Dkt. No.	
9	872-4	A mmla	Redacted as	Declaration of	872-1)	No
10	0/2-4	Apple	reflected in the	Mark Rollins	Competitively sensitive, non-	NO
			highlighted text		public	
11					information	
12					regarding Apple's: (1)	
13					internal billing	
					policies,	
14					processes, and	
15					systems for conducting	
16					litigation and	
10					managing vendor	
17					billing; (2) negotiations with	
18					each of Apple's	
10					vendors during	
19					the Epic matter; and/or (3)	
20					financial	
21					information	
22					relating to costs expended by	
					Apple in the <i>Epic</i>	
23					litigation	
24					contained in	
25					declaration. (Dkt. No. 872-1)	
	872-5	Apple	Redacted as	Declaration of	Competitively	No
26			reflected in the	Carlyn Irwin	sensitive, non-	
27			highlighted text		public information	
28					regarding	
_3						

1					Apple's: (1) internal billing	
$_{2}\parallel$					policies,	
_					processes, and	
3					systems for	
4					conducting	
					litigation and managing vendor	
5					billing; (2)	
6					negotiations with	
<u>,</u>					each of Apple's	
7					vendors during the Epic matter;	
8					and/or (3)	
9					financial	
9					information	
10					relating to costs	
11					expended by Apple in the <i>Epic</i>	
					litigation	
12					contained in	
13					declaration. (Dkt. No. 872-1)	
14	872-6	Apple	Redacted as	Ex. B to Irwin	Competitively	No
1.5			reflected in the	Declaration	sensitive, non-	
15			highlighted text		public information	
16					regarding	
17					Apple's: (1)	
					internal billing	
18					policies,	
19					processes, and systems for	
20					conducting	
20					litigation and	
21					managing vendor billing; (2)	
22					negotiations with	
23					each of Apple's	
					vendors during the Epic matter;	
24					and/or (3)	
25					financial	
26					information relating to costs	
27					expended by	
					Apple in the <i>Epic</i> litigation	
28					contained in	

					exhibit. (Dkt. No.	
1					872-1)	
2	872-7	Apple	Redacted as	Ex. C to Irwin	Competitively	No
3			reflected in the highlighted text	Declaration	sensitive, non- public	
			88		information	
4					regarding	
5					Apple's: (1) internal billing	
6					policies,	
7					processes, and	
					systems for conducting	
8					litigation and	
9					managing vendor billing; and/or (2)	
10					financial	
					information	
11					relating to costs expended by	
12					Apple in the <i>Epic</i>	
13					litigation	
					contained in exhibit. (Dkt. No.	
14					872-1)	
15	872-8	Apple	Entire document	Ex. E to Irwin	Competitively	No
16				Declaration	sensitive, non- public	
17					information	
					regarding	
18					Apple's: (1) internal billing	
19					policies,	
20					processes, and	
21					systems for conducting	
					litigation and	
22					managing vendor billing; and/or (2)	
23					financial	
24					information	
25					relating to costs expended by	
					Apple in the <i>Epic</i>	
26					litigation contained in	
27					exhibit. (Dkt. No.	
28					872-1)	

1	872-9	Apple	Redacted as	Declaration of	Competitively	No
1			reflected in the	Richard M.	sensitive, non-	
2			highlighted text	Pearl	public information	
3					regarding	
					Apple's: (1)	
4					internal billing	
5					policies,	
					processes, and	
6					systems for conducting	
7					litigation and	
					managing vendor	
8					billing; and/or (2)	
9					financial	
10					information relating to costs	
10					expended by	
11					Apple in the <i>Epic</i>	
12					litigation	
12					contained in	
13					declaration. (Dkt. No. 872-1)	
14	872-10	Apple	Redacted as	Ex. A to Pearl	Competitively	No
				i iza. A io i can	I COHIDCHLIVELY	
17	072-10	Арріс	reflected in the	Declaration		140
15	072-10	Прріс			sensitive, non- public	140
15	072-10	Прріс	reflected in the		sensitive, non- public information	110
15 16	072-10	Арріс	reflected in the		sensitive, non- public information regarding	
15	0/2-10	Прріс	reflected in the		sensitive, non- public information regarding Apple's: (1)	
15 16 17	0/2-10	Прріс	reflected in the		sensitive, non- public information regarding	
15 16 17 18	0/2-10	Арріс	reflected in the		sensitive, non- public information regarding Apple's: (1) internal billing policies, processes, and	
15 16 17	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for	
15 16 17 18	0/2-10	Лурге	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting	
15 16 17 18 19 20	0/2-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and	
15 16 17 18 19 20 21	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2)	
15 16 17 18 19 20	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial	
15 16 17 18 19 20 21	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information	
15 16 17 18 19 20 21 22 23	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs	
15 16 17 18 19 20 21 22	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i>	
15 16 17 18 19 20 21 22 23	672-10	Прри	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation	
15 16 17 18 19 20 21 22 23 24 25	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation contained in	
15 16 17 18 19 20 21 22 23 24	672-10	Прре	reflected in the		sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation	

1	893-3	Apple	Redacted as	Apple's Reply	Competitively	No
			reflected in the	in Support of	sensitive, non-	
2			highlighted text	Motion for Entry of	public information	
3				Judgment	regarding	
				· · · · · · · · · · · · · · · · · · ·	Apple's: (1)	
4					internal billing	
5					policies,	
					processes, and systems for	
6					conducting	
7					litigation and	
0					managing vendor	
8					billing; and/or (2)	
9					financial information	
10					relating to costs	
10					expended by	
11					Apple in the <i>Epic</i>	
12					litigation	
					contained in Reply. (Dkt. No.	
13					893-1)	
14	893-4	Apple	Redacted as	Supplemental	Competitively	No
T .		1 1PP10	Treducted db	Supplemental	Compentivery	110
		rippie	reflected in the	Declaration of	sensitive, non-	110
15		rippie			sensitive, non- public	
		Прри	reflected in the	Declaration of	sensitive, non- public information	
15 16		Прріс	reflected in the	Declaration of	sensitive, non- public information regarding	
15		Прри	reflected in the	Declaration of	sensitive, non- public information regarding Apple's: (1) internal billing	
15 16		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies,	
15 16 17 18		Прри	reflected in the	Declaration of	sensitive, non- public information regarding Apple's: (1) internal billing policies, processes, and	
15 16 17 18 19		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for	
15 16 17 18		Прри	reflected in the	Declaration of	sensitive, non- public information regarding Apple's: (1) internal billing policies, processes, and	
15 16 17 18 19		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor	
15 16 17 18 19 20 21		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2)	
15 16 17 18 19 20		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial	
15 16 17 18 19 20 21		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information	
15 16 17 18 19 20 21 22 23		Прри	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by	
15 16 17 18 19 20 21 22 23 24			reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i>	
15 16 17 18 19 20 21 22 23			reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation	
15 16 17 18 19 20 21 22 23 24 25			reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation contained in	
15 16 17 18 19 20 21 22 23 24		Търъс	reflected in the	Declaration of	sensitive, non-public information regarding Apple's: (1) internal billing policies, processes, and systems for conducting litigation and managing vendor billing; and/or (2) financial information relating to costs expended by Apple in the <i>Epic</i> litigation	

1	1067-3	Apple	Redacted as	Case	Competitively	No
			reflected in the highlighted text	Management Statement	sensitive, non- public	
2			inginighted text	Statement	information	
3					regarding Apple's	
4					business	
4					codenames regarding	
5					ongoing	
6					confidential	
					projects. (Dkt.	
7	1152-1	A1 a	Redacted as	Exhibit A to	No. 1067-1)	No
8	1132-1	Apple	reflected in the	Joint Status	Competitively sensitive, non-	NO
9			highlighted text	Report	public	
9					information	
10					regarding Apple's	
11					project codenames and	
10					its retention of	
12					outside counsel,	
13					as well as	
14					personally identifying	
14					information in the	
15					form of email	
16					addresses of	
1.7					Apple's employees. (Dkt.	
17					No. 1186-1)	
18	1304-2	Apple	Redacted as	Epic Games,	Competitively	No
19			reflected in the highlighted text	Inc's Motion for Relief from	sensitive, non- public	
20			88	Nondispositive	information	
				Order of a Magistrate	regarding Apple's	
21				Judge	engagement of outside legal	
22					counsel and	
23					consultants in connection with	
24					press and	
					communications	
25					legal strategy. (Dkt. No. 1341-1)	
26	1304-2	Apple	Redacted as	Exhibit A to	Exhibit A	
27			reflected in the	Epic Games,	contains	
			highlighted text	Inc's Motion for	personally	
28				Relief from	identifiable	

		T	1	1	,	
1				Nondispositive	information in the	
1				Order of a	form of email	
2				Magistrate	addresses of	
3				Judge	Apple employees. (Dkt. No. 1341-1)	
4	1329-3	Apple	Redacted portions as reflected in the	Apple Inc.'s Response to	Apple's Response includes	No
5			highlighted text	Order	quotations from	
				Regarding Discovery	document review protocols drafted	
6				Sanctions	by outside	
7					counsel to direct	
8					the document review conducted	
					in connection	
9					with discovery in	
10					this case and	
11					internal Apple	
11					legal guidance	
12					drafted by in house counsel	
12					(with the input of	
13					outside counsel)	
14					for the purpose of	
15					providing legal	
13					advice to Apple employees. This	
16					information is	
17					protected by the	
1 /					attorney-client	
18					privilege and	
10					work-product	
19					doctrine. (Dkt.	
20	1329-4	Apple	Redacted portions	Declaration of	No. 1329-1) The Perry	No
21	132)	Търге	as reflected in the highlighted text	Mark A. Perry in Support of	Declaration includes	110
22			inginighted text	Apple Inc.'s	quotations from	
23				Response to Order	document review	
				Regarding	protocols drafted by outside	
24				Discovery	counsel to direct	
25				Sanctions	the document review conducted	
26					in connection	
27					with discovery in this case and	
28					internal Apple	

			1	T		
1					legal guidance	
2					drafted by in house counsel	
2					(with the input of	
3					outside counsel)	
4					for the purpose of	
4					providing legal	
5					advice to Apple	
					employees. This information	
6					therefore is	
7					protected by the	
0					attorney-client	
8					privilege and	
9					work-product	
10					doctrine. (Dkt. No. 1329-1)	
10	1329-5	Apple	Entire document	Exhibit A to	Document review	No
11		11		Declaration of	protocols drafted	
12				Mark A. Perry	by outside	
12				in Support of	counsel to direct	
13				Apple Inc.'s	the document review conducted	
14				Response to Order	in connection	
14				Regarding	with discovery in	
15				Discovery	this case and	
16				Sanctions	internal Apple	
10					legal guidance	
17					drafted by in	
18					house counsel (with the input of	
10					outside counsel)	
19					for the purpose of	
20					providing legal	
20					advice to Apple	
21					employees. (Dkt. No. 1329-1)	
22	1329-6	Apple	Entire document	Exhibit B to	Document review	No
		11		Declaration of	protocols drafted	
23				Mark A. Perry	by outside	
24				in Support of	counsel to direct	
				Apple Inc.'s	the document review conducted	
25				Response to Order	in connection	
26				Regarding	with discovery in	
				Discovery	this case and	
27				Sanctions	internal Apple	
28					legal guidance	

1					drafted by in	
					house counsel (with the input of	
2					outside counsel)	
3					for the purpose of	
					providing legal	
4					advice to Apple	
5					employees. (Dkt.	
6	1329-7	Apple	Entire document	Exhibit C to	No. 1329-1) Document review	No
0	1525 7	ТРРТ	Zinino decament	Declaration of	protocols drafted	110
7				Mark A. Perry	by outside	
8				in Support of	counsel to direct	
				Apple Inc.'s Response to	the document review conducted	
9				Order	in connection	
10				Regarding	with discovery in	
1.1				Discovery	this case and	
11				Sanctions	internal Apple	
12					legal guidance drafted by in	
13					house counsel	
13					(with the input of	
14					outside counsel)	
15					for the purpose of	
					providing legal advice to Apple	
16					employees. (Dkt.	
17					No. 1329-1)	
10	1329-8	Apple	Entire document	Exhibit D to	Document review	No
18				Declaration of Mark A. Perry	protocols drafted by outside	
19				in Support of	counsel to direct	
20				Apple Inc.'s	the document	
21				Response to Order	review conducted in connection	
				Regarding	with discovery in	
22				Discovery	this case and	
23				Sanctions	internal Apple legal guidance	
					drafted by in	
24					house counsel	
25					(with the input of	
26					outside counsel) for the purpose of	
					providing legal	
27					advice to Apple	

	-	1			<u></u>	
1					employees. (Dkt. No. 1329-1)	
2	1329-9	Apple	Entire document	Exhibit K to	Document review	No
3				Declaration of Mark A. Perry	protocols drafted by outside	
				in Support of	counsel to direct	
4				Apple Inc.'s Response to	the document review conducted	
5				Order	in connection	
6				Regarding	with discovery in	
7				Discovery Sanctions	this case and internal Apple	
8					legal guidance	
					drafted by in house counsel	
9					(with the input of	
10					outside counsel) for the purpose of	
11					providing legal	
12					advice to Apple employees. (Dkt.	
13					No. 1329-1)	
	1355-2	Apple	Redacted portions	Exhibit A to	Contains	No
14			as reflected in the highlighted text	Epic Games' Response to	nonpublic Apple security	
15				Apple's	information, in	
16				Opposition to Discovery	the form of Apple web conference	
17				Sanctions	login and	
18					conference room information.	
					Disclosure of the	
19					redacted information	
20					relating to non-	
21					public sensitive	
22					financial information could	
23					harm Apple's	
					business interests and/or affect its	
24					market position.	
25	1355-3	Apple	Redacted portions	Epic Games'	(Dkt. No. 1378-1) Contains	No
26	1333-3	Търго	as reflected in the	Response to	competitively	110
27			highlighted text	Apple's Opposition to	sensitive, non- public	
28				Opposition to	information	
20						

1				Discovery	regarding Apple's	
1				Sanctions	financial	
2					information.	
2					Disclosure of the	
3					redacted information	
4					relating to non-	
					public sensitive	
5					financial	
6					information could	
					harm Apple's	
7					business interests	
o					and/or affect its	
8					market position.	
9	1542.0	A 1	D 1 . 1	GV 0000	(Dkt. No. 1378-1)	> T
1.0	1543-2	Apple	Redacted portions as reflected in the	CX-0009	Contains non-	No
10			highlighted text		public, competitively	
11			mgmighted text		sensitive financial	
					information	
12					that would harm	
13					Apple and/or	
13					third parties if	
14					disclosed. The	
15					financial	
13					information consists of Apple	
16					finances,	
17					projections,	
1 /					estimates, and	
18					developer cost	
1.0					estimates based	
19					on proprietary	
20					information.	
	1542.2	A1 -	Dadaatad nautiana	CX-0009-A	(Dkt. No. 1544-1)	No
21	1543-3	Apple	Redacted portions as reflected in the	CX-0009-A	Contains non-public,	NO
22			highlighted text		competitively	
					sensitive financial	
23					information	
24					that would harm	
					Apple and/or	
25					third parties if disclosed. The	
26					financial	
20					information	
27					consists of Apple	
28					finances,	
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1					projections,	
					estimates, and	
2					developer cost estimates based	
3					on proprietary	
					information.	
4					(Dkt. No. 1544-1)	
5	1543-4	Apple	Redacted portions as reflected in the	CX-0014	Contains non- public,	No
6			highlighted text		competitively	
					sensitive financial	
7					information	
8					that would harm	
					Apple and/or third parties if	
9					disclosed. The	
10					financial	
11					information	
11					consists of Apple finances,	
12					projections,	
13					estimates, and	
					developer cost	
14					estimates based	
15					on proprietary information.	
					(Dkt. No. 1544-1)	
16	1543-5	Apple	Redacted portions	CX-0015	Contains non-	No
17			as reflected in the		public,	
18			highlighted text		competitively sensitive financial	
					information	
19					that would harm	
20					Apple and/or	
21					third parties if disclosed. The	
21					financial	
22					information	
23					consists of Apple	
					finances, projections,	
24					estimates, and	
25					developer cost	
					estimates based	
26					on proprietary information.	
27					(Dkt. No. 1544-1)	
	<u> </u>	l	I	l	(210.10.10111)	

1	1543-6	Apple	Redacted portions	CX-0054	Contains non-	No
1			as reflected in the		public,	
2			highlighted text		competitively	
2					sensitive financial	
3					information that would harm	
4					Apple and/or	
_					third parties if	
5					disclosed. The	
6					financial	
					information	
7					consists of Apple	
8					finances,	
					projections,	
9					estimates, and developer cost	
10					estimates based	
10					on proprietary	
11					information.	
10					(Dkt. No. 1544-1)	
12	1543-7	Apple	Redacted portions	CX-0202	Contains a	No
13			as reflected in the		competitively	
			highlighted text		sensitive internal	
14					project codename.	
15					Disclosure of	
					confidential	
16					project	
17					codenames would	
1 /					harm Apple's	
18					business interests	
19					and/or aid bad	
19					actors to harm	
20					Apple, its customers, and	
21					developers. (Dkt.	
21					No. 1544-1)	
22	1543-8	Apple	Redacted portions	CX-0216	Contains non-	No
22			as reflected in the		public,	
23			highlighted text		competitively	
24					sensitive financial	
25					information that would harm	
25					Apple and/or	
26					third parties if	
25					disclosed. The	
27					financial	
28					information	

1					consists of Apple finances,	
2					projections,	
3					estimates, and developer cost	
					estimates based	
4					on proprietary information.	
5					(Dkt. No. 1544-1)	
6	1543-9	Apple	Redacted portions as reflected in the	CX-0223	Contains non-public,	No
7			highlighted text		competitively	
8					sensitive financial information	
9					that would harm	
10					Apple and/or third parties if	
					disclosed. The	
11					financial information	
12					consists of Apple	
13					finances, projections,	
14					estimates, and	
15					developer cost estimates based	
16					on proprietary	
					information. (Dkt. No. 1544-1)	
17	1543-	Apple	Redacted portions	CX-0224	Contains non-	No
18	10		as reflected in the highlighted text		public, competitively	
19					sensitive financial	
20					information that would harm	
21					Apple and/or	
22					third parties if disclosed. The	
23					financial information	
24					consists of Apple	
					finances, projections,	
25					estimates, and	
26					developer cost estimates based	
27					on proprietary	
28						

1					information.	
	1543-	A mm1a	Dadastad martians	CX-0225	(Dkt. No. 1544-1) Contains a	No
2	1343-	Apple	Redacted portions as reflected in the	CA-0223	competitively	INO
3	11		highlighted text		sensitive internal	
					project	
4					codename.	
5					Disclosure of	
					confidential project	
6					codenames would	
7					harm Apple's	
8					business interests	
0					and/or aid bad	
9					actors to harm Apple, its	
10					customers, and	
10					developers. (Dkt.	
11					No. 1544-1)	
12	1543-	Apple	Redacted portions	CX-0227	Contains non-	No
	12		as reflected in the		public,	
13			highlighted text		competitively sensitive financial	
14					information	
					that would harm	
15					Apple and/or	
16					third parties if disclosed. The	
1.7					financial	
17					information	
18					consists of Apple	
10					finances,	
19					projections,	
20					estimates, and developer cost	
21					estimates based	
41					on proprietary	
22					information.	
23	15.40	A 1	D 1 1 1 1	GM 0000	(Dkt. No. 1544-1)	> 7
	1543- 13	Apple	Redacted portions as reflected in the	CX-0229	Contains PII. Disclosure of	No
24	13		highlighted text		employees' PII	
25					could jeopardize	
					their privacy and	
26					risk misuse of	
27					sensitive personal	
					data. (Dkt. No. 1544-1)	
28		1		L	1 2 1 1 1 1	<u> </u>

1	1543-	Apple	Redacted portions	CX-0231	Contains non-	No
	14		as reflected in the highlighted text		public, competitively	
2			inginighted text		sensitive financial	
3					information	
4					that would harm Apple and/or	
					third parties if	
5					disclosed. The	
6					financial	
7					information consists of Apple	
					finances,	
8					projections,	
9					estimates, and developer cost	
10					estimates based	
					on proprietary	
11					information. (Dkt. No. 1544-1)	
12	1543-	Apple	Redacted portions	CX-0244	Contains	No
13	15	11	as reflected in the		information that	
			highlighted text		relates to Public	
14					Relations ("PR") professionals'	
15					private	
16					text message	
					conversations that include	
17					discussions of	
18					hiring and	
19					headcount needs,	
					PR work in general,	
20					and personal	
21					musings, that if	
22					revealed, may cause reputational	
					harm and undue	
23					attention toward the	
24					employees. (Dkt.	
25					No. 1544-1)	
	1543-	Apple	Redacted portions	CX-0246	Contains	No
26	16		as reflected in the highlighted text		information that reflects or relates	
27			inginighted text		to sensitive	
28						

1					business	
2					information of a third-party	
2					developer—	
3					specifically,	
4					finances and user data—which, if	
					revealed, could	
5					impact their	
6					competitive	
7					standing. (Dkt. No. 1544-1)	
	1543-	Apple	Redacted portions	CX-0257	Contains	No
8	17		as reflected in the	, , , , , , , , , , , , , , , , , , , ,	information that	
9			highlighted text		relates to PR	
10					professionals' private	
10					text message	
11					conversations that	
12					include	
					discussions of hiring and	
13					headcount needs,	
14					PR work in	
1.5					general,	
15					and personal	
16					musings, that if revealed, may	
17					cause reputational	
					harm and undue	
18					attention toward the	
19					employees. (Dkt.	
20					No. 1544-1)	
20	1543-	Apple	Redacted portions	CX-0264	Contains PII.	No
21	18		as reflected in the highlighted text		Disclosure of employees' PII	
22			inginighted text		could jeopardize	
					their privacy and	
23					risk misuse of	
24					sensitive personal data. (Dkt. No.	
25					1544-1)	
	1543-	Apple	Redacted portions	CX-0265	Contains non-	No
26	19		as reflected in the		public,	
27			highlighted text		competitively sensitive financial	
28					information	
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		ı		1		1
1					that would harm	
					Apple and/or	
2					third parties if disclosed. The	
3					financial	
					information	
4					consists of Apple	
5					finances,	
5					projections,	
6					estimates, and	
7					developer cost estimates based	
/					on proprietary	
8					information.	
0					Additionally, this	
9					document	
10					contains	
					privileged	
11					information,	
12					which has been clawed back	
					following	
13					inadvertent	
14					production.	
					Disclosure of this	
15					information	
16					would reveal to	
10					Apple's litigation	
17					adversaries confidential and	
18					privileged	
10					content and	
19					certain of Apple's	
20					class actions	
20					settlement	
21					considerations,	
22					which may be	
22					exploited. (Dkt. No. 1544-1)	
23	1543-	Apple	Redacted portions	CX-0266	Contains PII.	No
	20	Apple	as reflected in the	CA-0200	Disclosure of	110
24			highlighted text		employees' PII	
25					could jeopardize	
					their privacy and	
26					risk misuse of	
27					sensitive personal	
					data. (Dkt. No. 1544-1)	
28		l		L	13 44- 1)	

1	1543-	Apple	Redacted portions	CX-0268	Contains a	No
	21		as reflected in the highlighted text		competitively sensitive internal	
2			inginighted text		project	
3					codename.	
					Disclosure of	
4					confidential	
5					project	
					codenames would	
6					harm Apple's business interests	
7					and/or aid bad	
,					actors to harm	
8					Apple, its	
9					customers, and	
					developers. Also	
10					contains PII.	
11					Disclosure of	
11					employees' PII could jeopardize	
12					their privacy and	
13					risk misuse of	
13					sensitive personal	
14					data. (Dkt. No.	
1.5					1544-1)	
15	1543-	Apple	Redacted portions	CX-0272	Contains non-	No
16	22		as reflected in the highlighted text		public, competitively	
1.7			mgmighted text		sensitive financial	
17					information	
18					that would harm	
10					Apple and/or	
19					third parties if	
20					disclosed. The financial	
21					information	
21					consists of Apple	
22					finances,	
22					projections,	
23					estimates, and	
24					developer cost estimates based	
25					on proprietary	
25					information.	
26					(Dkt. No. 1544-1)	
	1543-	Apple	Redacted portions	CX-0279	Contains non-	No
27	23		as reflected in the		public,	
28			highlighted text		competitively	

	T			_	,	, i
1					sensitive financial	
2					information that would harm	
2					Apple and/or	
3					third parties if	
4					disclosed. The	
4					financial	
5					information consists of Apple	
6					finances,	
0					projections,	
7					estimates, and	
8					developer cost	
					estimates based on proprietary	
9					information.	
10					(Dkt. No. 1544-1)	
	1543-	Apple	Redacted portions	CX-0281	Contains a	No
11	24		as reflected in the		competitively	
12			highlighted text		sensitive internal	
1.0					project codename.	
13					Disclosure of	
14					confidential	
1.5					project	
15					codenames would	
16					harm Apple's business interests	
17					and/or aid bad	
1 /					actors to harm	
18					Apple, its	
19					customers, and	
					developers. (Dkt. No. 1544-1)	
20	1543-	Apple	Redacted portions	CX-0291	Contains non-	No
21	25		as reflected in the		public,	
22			highlighted text		competitively sensitive financial	
23					information that would harm	
					Apple and/or	
24					third parties if	
25					disclosed. The	
26					financial information	
					consists of Apple	
27					finances,	
28					projections,	

1					estimates, and	
					developer cost	
2					estimates based	
3					on proprietary information.	
3					(Dkt. No. 1544-1)	
4	1543-	Apple	Redacted portions	CX-0384	Contains PII.	No
5	26		as reflected in the		Disclosure of	
			highlighted text		employees' PII could jeopardize	
6					their privacy and	
7					risk misuse of	
0					sensitive personal	
8					data. (Dkt. No.	
9	1.7.10		D 1 . 1	CX1 0.425	1544-1)	.
10	1543- 27	Apple	Redacted portions as reflected in the	CX-0435	Contains PII. Disclosure of	No
10	27		highlighted text		employees' PII	
11					could jeopardize	
12					their privacy and	
12					risk misuse of	
13					sensitive personal	
14					data. (Dkt. No. 1544-1)	
14	1543-	Apple	Redacted portions	CX-0464	Contains	No
15	28	11	as reflected in the		information that	
16			highlighted text		relates to PR	
					professionals'	
17					private text message	
18					conversations that	
19					include	
					discussions of hiring and	
20					headcount needs,	
21					PR work in general,	
22					and personal	
23					musings, that if	
					revealed, may	
24					cause reputational harm and undue	
25					attention toward	
26					employees. (Dkt.	
27					No. 1544-1)	

1	1543-	Apple	Redacted portions	CX-0478	Contains PII.	No
	29		as reflected in the highlighted text		Disclosure of employees' PII	
2			inginighted text		could jeopardize	
3					their privacy and	
4					risk misuse of	
4					sensitive personal	
5					data. Additionally,	
6					contains a	
					competitively	
7					sensitive internal	
8					project	
0					codename. Disclosure of	
9					confidential	
10					project	
					codenames would	
11					harm Apple's	
12					business interests and/or aid bad	
					and/or aid bad actors to harm	
13					Apple, its	
14					customers, and	
					developers. (Dkt.	
15	15.40	. 1	D 1 1 1	CY 0.450	No. 1544-1)	37
16	1543- 30	Apple	Redacted portions as reflected in the	CX-0479	Contains PII. Disclosure of	No
1.7	30		highlighted text		employees' PII	
17			inginighted text		could jeopardize	
18					their privacy and	
10					risk misuse of	
19					sensitive personal	
20					data. (Dkt. No. 1544-1)	
21	1543-	Apple	Redacted portions	CX-0484	Contains PII.	No
	31		as reflected in the		Disclosure of	
22			highlighted text		employees' PII could jeopardize	
23					their privacy and	
24					risk misuse of	
∠ ✝					sensitive personal	
25					data. (Dkt. No.	
26	1543-	Apple	Redacted portions	CX-0485	1544-1) Contains PII.	No
	32	1 ippic	as reflected in the	O11 0103	Disclosure of	110
27			highlighted text		employees' PII	
28					could jeopardize	

1					their privacy and risk misuse of	
2					sensitive personal	
3					data. (Dkt. No. 1544-1)	
4	1543- 33	Apple	Redacted portions as reflected in the	CX-0486	Contains PII. Disclosure of	No
5			highlighted text		employees' PII	
					could jeopardize their privacy and	
6					risk misuse of	
7					sensitive personal data. (Dkt. No.	
8					1544-1)	
9	1543- 34	Apple	Redacted portions as reflected in the	CX-0487	Contains competitively	No
10	34		highlighted text		sensitive internal	
11					project codenames.	
12					Disclosure of	
					confidential project	
13					codenames would	
14					harm Apple's business interests	
15					and/or aid bad	
16					actors to harm Apple, its	
17					customers, and	
18					developers. (Dkt. No. 1544-1)	
19	1543-	Apple	Redacted portions	CX-0488	Contains PII.	No
20	35		as reflected in the highlighted text		Disclosure of employees' PII	
					could jeopardize their privacy and	
21					risk misuse of	
22					sensitive personal data. (Dkt. No.	
23					1544-1)	
24	1543- 36	Apple	Redacted portions as reflected in the	CX-0489	Contains PII. Disclosure of	No
25			highlighted text		employees' PII	
26					could jeopardize their privacy and	
27					risk misuse of	
<i></i> /					sensitive personal	

1					data. (Dkt. No. 1544-1)	
2	1543- 37	Apple	Redacted portions as reflected in the	CX-0490	Contains PII. Disclosure of	No
3	37		highlighted text		employees' PII	
			8 8		could jeopardize	
4					their privacy and risk misuse of	
5					sensitive personal	
6					data. (Dkt. No.	
7	1543-	A1 .	Dadaatad nautiana	CX-0496	1544-1) Contains PII.	No
	38	Apple	Redacted portions as reflected in the	CA-0490	Disclosure of	INO
8			highlighted text		employees' PII	
9					could jeopardize	
10					their privacy and risk misuse of	
					sensitive personal	
11					data. Additionally,	
12					contains a	
13					competitively	
14					sensitive internal project	
14					codename.	
15					Disclosure of	
16					confidential project	
17					codenames would	
					harm Apple's	
18					business interests and/or aid bad	
19					actors to harm	
20					Apple, its	
					customers, and developers. (Dkt.	
21					No. 1544-1)	
22	1543- 39	Apple	Redacted portions as reflected in the	CX-0499	Contains PII. Disclosure of	No
23	39		highlighted text		employees' PII	
24					could jeopardize	
					their privacy and risk misuse of	
25					sensitive personal	
26					data.	
27					Additionally, this document	
28					contains	

1					privileged	
					information.	
2					Disclosure of this information	
3					would reveal to	
3					Apple's litigation	
4					adversaries	
_					confidential and	
5					privileged	
6					content and	
					certain of Apple's	
7					class actions	
8					settlement	
0					considerations,	
9					which may be	
10					exploited. (Dkt. No. 1544-1)	
10	1543-	Apple	Redacted portions	CX-0503	Contains PII.	No
11	40	Tippio	as reflected in the		Disclosure of	110
1.0			highlighted text		employees' PII	
12					could jeopardize	
13					their privacy and	
					risk misuse of	
14					sensitive personal	
15					data. (Dkt. No. 1544-1)	
16	1543-	Apple	Redacted portions	CX-0505	Contains PII.	No
	41		as reflected in the		Disclosure of	
17			highlighted text		employees' PII could jeopardize	
18					their privacy and	
10					risk misuse of	
19					sensitive personal	
20					data.	
20					Additionally, this	
21					document	
22					contains privileged	
22					information.	
23					Disclosure of this	
24					information	
24					would reveal to	
25					Apple's litigation	
26					adversaries	
26					confidential and	
27					privileged content and	
20					certain of Apple's	
28				1	contain of rippie s	

1					class actions	
					settlement	
2					considerations,	
3					which may be exploited. (Dkt.	
3					No. 1544-1)	
4	1543-	Apple	Redacted portions	CX-0506	Contains	No
5	42	11	as reflected in the		competitively	
3			highlighted text		sensitive internal	
6					project	
, II					codenames.	
7					Disclosure of confidential	
8					project	
					codenames would	
9					harm Apple's	
10					business interests	
					and/or aid bad	
11					actors to harm	
12					Apple, its customers, and	
					developers. This	
13					document also	
14					contains PII.	
					Disclosure of	
15					employees' PII	
16					could jeopardize	
.					their privacy and risk misuse of	
17					sensitive personal	
18					data.	
					Additionally, this	
19					document	
20					contains	
					privileged information.	
21					Disclosure of this	
22					information	
					would reveal to	
23					Apple's litigation	
24					adversaries	
25					confidential and privileged	
25					content and	
26					certain of Apple's	
27					class actions	
27					settlement	
28					considerations,	
		<u> </u>			which may be	

1					exploited. (Dkt. No. 1544-1)	
2	1543-	Apple	Redacted portions	CX-0509	Contains PII.	No
	43		as reflected in the		Disclosure of	
3			highlighted text		employees' PII could jeopardize	
4					their privacy and	
5					risk misuse of	
					sensitive personal data. (Dkt. No.	
6					1544-1)	
7	1543-	Apple	Redacted portions	CX-0511	Contains PII.	No
8	44		as reflected in the		Disclosure of	
			highlighted text		employees' PII could jeopardize	
9					their privacy and	
10					risk misuse of	
11					sensitive personal data. (Dkt. No.	
					1544-1)	
12	1543-	Apple	Redacted portions	CX-0532	Contains PII.	No
13	45		as reflected in the highlighted text		Disclosure of employees' PII	
14			inginighted text		could jeopardize	
1.5					their privacy and	
15					risk misuse of	
16					sensitive personal data. (Dkt. No.	
17					1544-1)	
18	1543- 46	Apple	Redacted portions as reflected in the	CX-0538	Contains	No
	40		highlighted text		competitively sensitive internal	
19					project	
20					codenames. Disclosure of	
21					confidential	
22					project codenames would	
					harm Apple's	
23					business interests and/or aid bad	
24					and/or aid bad actors to harm	
25					Apple, its	
26					customers, and	
					developers. This document also	
27					contains PII.	
28					Disclosure of	

employees' PH could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, this document contains privileged information. Disclosure of this information would reveal to Apple's litigation adversaries confidential and privileged content and certain of Apple's class actions settlement considerations, which may be exploited. (Dtk. No. 1544-1) To a ser effected in the highlighted text Example 1543- 47 Apple Redacted portions as reflected in the highlighted text CX-0539 Contains PH. No Disclosure of employees' PH could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple finances,				T	T		
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13 14 15 1543- 1543- 47 Apple Redacted portions as reflected in the highlighted text CX-0539 COntains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	10						
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which may be exploited. (Dkt. No. 1544-1) 1543-47 Apple Redacted portions as reflected in the highlighted text CX-0539 Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	13						
15 16 1543- Apple Redacted portions as reflected in the highlighted text CX-0539 Contains PIL. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	1.4					I	
15	14						
16 17 47 Apple Redacted portions as reflected in the highlighted text CX-0539 Contains PII. Disclosure of employees' PII could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	15						
17 18 19 20 21 22 23 24 25 26 27 28	16		Apple		CX-0539		No
could jeopardize their privacy and risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	10	47					
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risk misuse of sensitive personal data. Additionally, the document contains non-public, competitively sensitive financial information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	18						
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21 22 23 24 25 26 27 28 28 29 20 20 20 20 20 20 20	20						
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24 information that would harm Apple and/or third parties if disclosed. The financial information consists of Apple	22						
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Apple and/or third parties if disclosed. The financial information consists of Apple	24						
third parties if disclosed. The financial information consists of Apple	25						
27 financial information consists of Apple						third parties if	
27 information consists of Apple	26						
28 consists of Apple	27						
	28						

1					projections,	
1					estimates, and	
2					developer cost	
					estimates based	
3					on proprietary	
4					information.	
	1543-	A mmla	Dadastad martians	CX-0540	(Dkt. No. 1544-1) Contains	No
5	48	Apple	Redacted portions as reflected in the	CA-0340	information that	INO
6	70		highlighted text		relates to PR	
6			inginighted text		professionals'	
7					private	
_					text message	
8					conversations that	
9					include	
					discussions of	
10					hiring and	
11					headcount needs,	
11					PR work in	
12					general, and personal	
1.0					musings, that if	
13					revealed, may	
14					cause reputational	
					harm and undue	
15					attention toward	
16					the	
10					employees.	
17					Additionally, this	
10					document contains	
18					privileged	
19					information.	
•					Disclosure of this	
20					information	
21					would reveal to	
					Apple's litigation	
22					adversaries	
23					confidential and	
23					privileged content and	
24					certain of Apple's	
25					class actions	
23					settlement	
26					considerations,	
27					which may be	
27					exploited. (Dkt.	
28					No. 1544-1)	

1	1543-	Apple	Redacted portions	CX-0859	Contains	No
	49		as reflected in the		privileged	
2			highlighted text		information. Disclosure of this	
3					information	
5					would reveal to	
4					Apple's litigation	
5					adversaries	
3					confidential and	
6					privileged	
_					content and	
7					certain of Apple's	
8					class actions settlement	
					considerations,	
9					which may be	
10					exploited. (Dkt.	
10					No. 1544-1)	
11	1543-	Apple	Redacted portions	CX-1103	Contains PII.	No
12	50		as reflected in the		Disclosure of	
12			highlighted text		employees' PII	
13					could jeopardize	
1.4					their privacy and risk misuse of	
14					sensitive personal	
15					data.	
					Additionally, this	
16					document	
17					contains	
					privileged	
18					information.	
19					Disclosure of this information	
1)					would reveal to	
20					Apple's litigation	
21					adversaries	
21					confidential and	
22					privileged	
22					content and	
23					certain of Apple's	
24					class actions settlement	
2.5					considerations,	
25					which may be	
26					exploited. (Dkt.	
					No. 1544-1)	
27					,	

1	1543- 51	Apple	Redacted portions as reflected in the	CX-1208	Contains	No
2	31		highlighted text		competitively sensitive internal	
					project	
3					codenames. Disclosure of	
4					confidential	
5					project	
					codenames would harm Apple's	
6					business interests	
7					and/or aid bad	
8					actors to harm Apple, its	
9					customers, and	
9					developers. (Dkt.	
10	1543-	Apple	Redacted portions	CX-1211	No. 1544-1) Contains	No
11	52	Арріс	as reflected in the	CA-1211	competitively	110
12			highlighted text		sensitive internal	
					project codenames.	
13					Disclosure of	
14					confidential	
15					project codenames would	
					harm Apple's	
16					business interests	
17					and/or aid bad actors to harm	
18					Apple, its	
19					customers, and	
					developers. (Dkt. No. 1544-1)	
20	1543-	Apple	Redacted portions	CX-1303	Contains non-	No
21	53		as reflected in the		public,	
22			highlighted text		competitively sensitive financial	
23					information	
					that would harm Apple and/or	
24					third parties if	
25					disclosed. The	
26					financial information	
					consists of Apple	
27					finances,	
28					projections,	

1					estimates, and	
1					developer cost	
2					estimates based	
2					on proprietary	
3					information.	
4	1543-	A mm1a	Dadastad martians	CX-1304	(Dkt. No. 1544-1) Contains non-	No
	54	Apple	Redacted portions as reflected in the	CA-1304	public,	INO
5] 34		highlighted text		competitively	
6			inginighted text		sensitive financial	
0					information	
7					that would harm	
					Apple and/or	
8					third parties if	
9					disclosed. The	
					financial	
10					information	
11					consists of Apple	
11					finances,	
12					projections, estimates, and	
					developer cost	
13					estimates based	
14					on proprietary	
1.					information.	
15					(Dkt. No. 1544-1)	
16	1543-	Apple	Redacted portions	CX-1310	Contains PII.	No
10	55		as reflected in the		Disclosure of	
17			highlighted text		employees' PII	
1.0					could jeopardize	
18					their privacy and	
19					risk misuse of sensitive personal	
					data. (Dkt. No.	
20					1544-1)	
21	1621-2	Apple	Redacted portions	Exhibit A to	Epic's Motion	No
21		11	as reflected in the	Epic's Motion	contains excerpts	
22			highlighted text	for Relief from	of Apple's	
22				a Non-	privilege log,	
23				Dispositive	including PII.	
24				Order of a	Disclosure of	
				Magistrate	employees' PII	
25				Judge	could jeopardize their privacy and	
26					risk misuse of	
					sensitive personal	
27					data. (Dkt. No.	
28					1638)	
40		•	•	•	. ,	

Okt. No.	Sealing Party	Portion to be Sealed	Description	Sealing Basis (Supporting Declaration)	Previously Sealed
916-3	Apple	Redactions indicated in the attached version	Apple Inc.'s Opposition to Epic Games, Inc.'s Motion to Enforce Injunction	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in Opposition. (Dkt. No. 916-1)	No
016-5	Apple	Redactions indicated in the attached version	Declaration of Alex Roman In Support of Apple Inc.'s Opposition	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in declaration. (Dkt. No. 916-1)	No
6-7	Apple	Redactions consistent with Dkt. No. 1542-5 and indicated in the attached version	Exhibit 1 to Alex Roman Declaration	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions contained in declaration. (Dkt. No. 916-1)	No
922-1	Apple	Redactions indicated in the attached version	Reply Memorandum re Motion to Enforce Injunction	Competitively sensitive business information regarding Apple's internal financial analysis, research, and pricing decisions	No

		T	1	T		
1					contained in	
					Epic's reply.	
2	922-2	A mm1 a	Redactions indicated	Declaration of	(Dkt. No. 933-1)	No
3	922-2	Apple	in the attached	Ned S. Barnes	Competitively sensitive business	NO
3			version	Neu S. Darlies	information	
4			Version		regarding Apple's	
_					internal financial	
5					analysis, research,	
6					and pricing	
					decisions	
7					contained in	
8					expert declaration	
					filed in support of	
9					Epic's motion. (Dkt. No. 933-1)	
10	926-1	Apple	Redactions indicated	Corrected Reply	Competitively	No
10	720 1	rippic	in the attached	Memorandum re	sensitive business	110
11			version	Motion to	information	
12				Enforce	regarding Apple's	
12				Injunction	internal financial	
13					analysis, research,	
1.4					and pricing decisions	
14					contained in	
15					Epic's reply.	
					(Dkt. No. 933-1)	
16	926-2	Apple	Redactions indicated	Declaration of	Competitively	No
17			in the attached	Ned S. Barnes	sensitive business	
			version		information	
18					regarding Apple's	
19					internal financial analysis, research,	
					and pricing	
20					decisions	
21					contained in	
					expert declaration	
22					filed in support of	
23					Epic's motion.	
	1035-2	Annla	Redactions	Exhibit A to	(Dkt. No. 933-1) Competitively	No
24	1033-2	Apple	consistent with Dkt.	Exhibit A to	sensitive business	110
25			No. 1542-26 and	Opposition to	information	
			indicated in the	Apple's Motion	regarding the	
26			attached version	to Modify Order	hiring needs of	
27				Regarding	Apple's PR	
				Witness	department and	
28				Communications	PR strategy as	

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		well as personally
		identifiable
		information
		contained in
		Exhibit A to
		Epic's motion.
		(Dkt. No. 1037)

Pursuant to this Court's sealing procedures detailed in Section 12 of the Standing Order, the following are attached hereto: (i) the Declarations of Mark A. Perry and Cynthia Richman supporting the requests to seal; (ii) the redacted versions of the eight documents whose sealing the parties seek to modify; and (iii) a Proposed Order On Undisputed Sealing Requests.

IT IS SO STIPULATED, through Counsel of Record.

Dated: August 12, 2025 Respectfully submitted,

By: /s/ Gary A. Bornstein

CRAVATH, SWAINE & MOORE LLP

Gary A. Bornstein (pro hac vice) gbornstein@cravath.com
Yonatan Even (pro hac vice) yeven@cravath.com
Lauren A. Moskowitz (pro hac vice) lmoskowitz@cravath.com
Michael J. Zaken (pro hac vice) mzaken@cravath.com
M. Brent Byars (pro hac vice) mbyars@cravath.com

375 Ninth Avenue New York, New York 10001 Telephone: (212) 474-1000 Facsimile: (212) 474-3700

Attorneys for Plaintiff Epic Games, Inc.

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	Dated: August 12, 2025	Respectfully submitted,	
1	,	By: /s/ Mark A. Perry	
2		By. 18/ Mark A. Terry	_
3		WEIL, GOTSHAL & MANGES LLP	
4		Mark A. Perry Joshua M. Wesneski	
5		Joshua IVI. Wesheski	
6		GIBSON, DUNN & CRUTCHER	
7		Cynthia E. Richman	
8		Attorneys for Defendant Apple Inc.	
9		Auorneys jor Dejenduni Apple Inc.	
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	OMNIBUS SEALING STIPULATION	N	

E-FILING ATTESTATION

I, Mark Perry, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Mark A. Perry

Mark A. Perry